

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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NANCY F. MANZ,

Plaintiff,

-against-

EILEEN GIAGRASSO, MANUELLA IGNASIO,
PATRICE KELLY, RICHARD MURPHY, AND
LORI RAFFINETTI,

Defendants.
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: Docket No. 2:18-CV-05171
: (JFB) (AYS)
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DISCOVERY PLAN WORKSHEET

**(Please be advised that the Court's Individual Rules include additional forms
to be used in cases involving claims of adverse employment or FLSA violations.)**

Tier I Pre-Settlement Discovery

Deadline for completion of Rule 26(a) initial disclosure
and HIPAA-complaint records authorizations:

April 8, 2019

Completion date for Phase I Discovery

As agreed upon by the parties:

April 25, 2019

*(Reciprocal and agreed upon document production,
generally not including depositions, unless otherwise agreed.
No more than 30 days after Initial Conference)*

Status conference TBD by the court:

May 9, 2019

(Generally 15 days post Tier I Discovery)

Tier II Discovery and Motion Practice

Motion to join new parties or amend the pleadings:

May 23, 2019

(Presumptively 15 days post status conference)

First requests for production of documents

and for interrogatories due by:

June 6, 2019

(Presumptively 15 days post joining/amending)

All fact discovery completed by:

Sept. 20, 2019

(Presumptively 3.5 months post first

Requests for documents/interrogatories)

Exchange of expert reports completed by:

Oct. 21, 2019

(Presumptively 30 days post fact discovery)

Expert depositions completed by:
(Presumptively 30 days post expert reports)

Nov. 20, 2019

Final date to take first step in dispositive motion practice:
*(Parties are directed to consult the District Judge's
Individual rules regarding such motion practice.
Presumptively 30 days post expert depositions)*

Dec. 20, 2019

COMPLETION OF ALL DISCOVERY BY:
(Note: Presumptively 9 months after Initial Conference)

Submission of joint pre-trial order:
Final Pre-Trial Conference TBD by the court:

TBD

TBD